

# Consumer Protection and Green Tagging



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# RECs WHITE PAPER



- COLLABORATIVE PROCESS

- VOLUNTARY

# RECs WHITE PAPER



## ■ **GOAL:**

- TO EDUCATE POTENTIAL STAKEHOLDERS
- TO IDENTIFY NATIONAL ISSUES
- TO SUGGEST MITIGATION OPTIONS
- TO OBTAIN ENDORSEMENTS FOR MINIMAL  
MARKET STRUCTURE

# RECs WHITE PAPER



## ■ TOPIC AREAS:

- DEFINITIONS

- PROPERTY/LEGAL ISSUES

- DOUBLE COUNTING

- DISCLOSURE/CONSUMER PROTECTION

- INTERNATIONAL LINKS

# Consumer Protection Concerns



- Marketing Claims- unbundled attributes
- Characteristics of tags
- Lack of consumer sophistication
- Verification and tracking
- Coordination with state disclosure laws
- Double counting
- Property rights

# Consumer Protection Concerns (cont.)



- Need for different levels of disclosure
- Location of emissions benefit/geographic and temporal limitation
- Which authorities have jurisdiction to impose rules on the nature, ownership, disposition and transfer of RECs? Under what circumstances?

# Consumer Information



- Technology/Fuel type
- Geographic location of generation
- Whether there has been any unbundling of tag attributes and if so, which ones
- Date of generation
- Vintage of plant (new renewables)
- Accompanying information -- database

# Immediate Needs



- National Accounting/Verification System
  - National Registry/database
- Support for National RECs Policy Guidelines
- Evolution of state verification and disclosure laws
- Education campaign
- Normalization of RECs with RPS/GPS/SBC